

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
CAMDEN VICINAGE**

**IN RE: VALSARTAN, LOSARTAN, AND
IRBESARTAN PRODUCTS LIABILITY
LITIGATION**

MDL No. 2875

Honorable Robert B. Kugler,
District Court Judge

Honorable Thomas Vanaskie (Ret.),
Special Discovery Master

DECLARATION OF SETH A. GOLDBERG

I, Seth A. Goldberg, of full age, hereby declare as follows:

1. I am an attorney at law of the State of New Jersey, a member of good standing of the bar of this Court, a Partner with the law firm of Duane Morris LLP, and counsel to Defendants Zhejiang Huahai Pharmaceutical Co., Ltd. (“ZHP”), Princeton Pharmaceutical Inc. (“Princeton”), Solco Healthcare U.S. (“Solco”), and Huahai U.S. Inc. (“Huahai U.S.”), and collectively with ZHP, Princeton, and Solco, “the ZHP Parties”).

2. I make this Declaration based on personal knowledge and in support of the ZHP Parties’ Brief in Opposition to Plaintiffs’ Request for Monetary Sanctions in Response to Special Master Order 56.

3. Attached to this Declaration as **Attachment A** is a table providing the total time of Ms. Linda Lin’s deposition, in addition to the time associated with various deposition excerpts quoted in Plaintiffs’ Motion for Sanctions for Defendant ZHP’s Obstruction and Failure to Provide Responsive Deposition Testimony.

I hereby certify that the aforementioned statements made by me are true. I am aware that if any of the aforementioned statements made by me are willfully false, I am subject to punishment.

February 9, 2022.

Respectfully submitted,

/s/ Seth A. Goldberg
Seth A. Goldberg, Esq.
*Lead Counsel and Liaison
Counsel for Defendants*

DUANE MORRIS LLP

Seth A. Goldberg, *Lead Counsel and
Liaison Counsel for Defendants*
30 South 17th Street
Philadelphia, Pennsylvania 19103
Tel.: (215) 979-1000
Fax: (215) 979-1020
SAGoldberg@duanemorris.com

*Attorneys for Zhejiang Huahai
Pharmaceutical Co, Ltd., Princeton
Pharmaceutical Inc., and Solco*